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VIA ECF AND ELECTRONIC MAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Room 723
New York, New York 10004-1408
Bernstein.chambers@nysb.uscourts.gov

Re: In re: Bernard L. Madoff—Hearing on Trader Subpoena Issue

Dear Judge Bernstein:

We write to oppose Chaitman LLP's offer to refrain from "accepting" any compliance with the subpoenas in exchange for adjourning the hearing on the Trustee's request to quash. Absent a direct instruction to the subpoenaed parties to hold compliance in abeyance, such an arrangement would be prejudicial to both the Trustee and the subpoenaed parties.

Accordingly, the Trustee respectfully requests that the hearing go forth as scheduled on Monday, April 10, 2017 at 11:00 am. If the Court prefers to adjourn, then the Trustee respectfully requests that the Court enter an interim order quashing all ten of the subpoenas and instructing Ms. Chaitman to so-inform all subpoenaed parties in writing, copy to counsel for the Trustee, within one business day of that order. The Trustee asserts that such relief is just and proper under the present circumstances. Ms. Chaitman can then seek this Court's permission to pursue any of version of the subpoenas the Court may find appropriate after a re-scheduled hearing with all parties present.

Respectfully submitted,

/s/ Edward J. Jacobs
Edward J. Jacobs

cc: Helen Davis Chaitman (via email)
Gregory Dexter (via email)